

## State Water Resources Control Board

April 19, 2018

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7017 2680 0000 6289 4930**

Ms. Carol Johnson  
Interim Director  
Santa Cruz County General Services Department  
701 Ocean Street, Suite 330  
Santa Cruz, California 95060  
[carol.johnson@santacruzcounty.us](mailto:carol.johnson@santacruzcounty.us)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM  
LOCATED AT SANTA CRUZ COUNTY GENERAL SERVICES DEPARTMENT –  
FLEET OPERATIONS, 691 OCEAN STREET, SANTA CRUZ**

Dear Ms. Johnson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on April 11, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Secondary Containment</b> – The under-dispenser containment (UDC) #1 failed secondary containment testing.	Regular Unleaded	3/14/17	Ongoing	H&SC 25291(a)(2)
2	<b>Failure to Perform Secondary Containment Testing</b> – The piping sump was not tested due to torn test boots.	Regular Unleaded	4/01/17	Ongoing	23 CCR 2637(a)
3	<b>Failure to Maintain Tank Information Form</b> – CERS identifies the piping is a safe suction system; however, it should be listed as a conventional suction system.	Regular Unleaded	4/11/18	Ongoing	23 CCR 2711(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	<b>Failure to Maintain Financial Responsibility</b> – The Certification of Financial Responsibility needs to be updated to reflect the current financial mechanism being used. If self-insurance is being used, a self-insurance test is required and should reflect the current financial status of the county.	Regular Unleaded	4/11/18	Ongoing	23 CCR 2711(a)(11)
5	<b>Failure to Maintain Site Map</b> – The site plan in CERS does not show the location of the piping, sensors in the UDCs, and monitoring panel.	Regular Unleaded	4/11/18	Ongoing	23 CCR 2711(a)(8)
6	<b>Failure to Maintain Facility Information</b> – In CERS, under the financial responsibility mechanism section, the facility list both local government and state fund with a Chief Financial Officer letter. The facility needs to identify what mechanism is currently being used and update CERS.	Regular Unleaded	4/11/18	Ongoing	23 CCR 2711(a)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Santa Cruz County Environmental Health within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Mr. Joseph Lovesee  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[joseph.lovesee@waterboards.ca.gov](mailto:joseph.lovesee@waterboards.ca.gov)

**Local CUPA**

Ms. Rebecca Supplee  
Hazardous Materials Program Manager  
Environmental Health Division  
Santa Cruz Health Services Agency  
701 Ocean Street, Suite 312  
Santa Cruz, California 95060  
[rebecca.supplee@santacruzcounty.us](mailto:rebecca.supplee@santacruzcounty.us)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: *(via email only)*

Ms. Rebecca Supplee  
Hazardous Materials Program Manager  
County of Santa Cruz  
[rebecca.supplee@santacruzcounty.us](mailto:rebecca.supplee@santacruzcounty.us)